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June 22, 2020

Via ECF

Honorable Edward S. Kiel, U.S.M.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S. Post
Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: Scalia v. 300 Broadway Healthcare, L.L.C., et al 2:20-00622-CCC-ESK

Dear Judge Kiel:

This firm represents Defendant Steve Kleiman and Defendant New Vista in the above referenced matter. On June 12, 2020, the Third Party Defendants Rivka C. Klieman, Rivka B. Klieman, and TNUZEG Holdings (hereinafter, "Third Party Defendants") retained this firm. The purpose of this letter is to advise the Court of the parties communications related to the filing of the Third Party Defendants' Answers to Defendant Weinberger's Cross-Claim.

On June 19, 2020, the Court entered an order denying the Entry of Default against the Third Party Defendants and directed them to Answer the Cross-Claim by June 24, 2020. Due to the continued circumstances, we have found it difficult to meet and confer with our clients to discuss the nature of the claims against them.

On June 15, 2020, through his counsel, Defendant Weinberger agreed to permit the Third Party Defendants to file their Answers to his Cross-Claim by July 2, 2020. Plaintiff, Secretary of Labor, took no position on the Third Party Defendants request for extended time.

With the Courts permission it is respectfully requested that the Third Party Defendants be permitted to file their Answers by July 2, 2020. Thank you for your attention to this matter.

Sincerely,

JASINSKI, P.C.

s/ Robert P. Manetta

ROBERT P. MANETTA